

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

JAMES M. SWEENEY, *et al.*, )  
Plaintiffs, ) CIVIL ACTION  
vs. ) NO. 08 C 6961  
MILLENNIUM CONCRETE ) JUDGE CHARLES P. KOCORAS  
CONSTRUCTION, LLC, d/b/a )  
MILLENNIUM CONCRETE, LLC, )  
Defendant. )

**MOTION FOR ENTRY OF DEFAULT AND JUDGMENT**

NOW COME Plaintiffs, by their attorneys, and move for entry of judgment by default against Defendant, MILLENNIUM CONCRETE CONSTRUCTION, LLC, d/b/a MILLENNIUM CONCRETE, LLC, in the total amount of \$83,342.57, plus Plaintiffs' court costs and reasonable attorneys' fees in the amount of \$2,564.50.

On January 13, 2009, the Summons and Complaint was served on the Registered Agent by tendering a copy of said documents to him personally at his residence (a copy of the Summons and Affidavit of Service is attached hereto). Therefore, Defendant's answer was due on February 2, 2009. As Defendant has failed to timely answer the Complaint, Plaintiffs respectfully request entry of default and judgment.

/s/ Patrick N. Ryan

## **CERTIFICATE OF SERVICE**

The undersigned, an attorney of record, hereby certifies that he electronically filed the foregoing document (Motion for Entry of Default and Judgment) with the Clerk of Court using the CM/ECF system, and further certifies that I have mailed the above-referenced document by United States Mail to the following non-CM/ECF participants on or before the hour of 5:00 p.m. this 10th day of February 2009:

Mr. Herbert Molitsky, Registered Agent  
Millennium Concrete Construction, LLC  
455 E. Illinois Street, Suite 260  
Chicago, IL 60610

Mr. Herbert Molitsky, Registered Agent  
Millennium Concrete Construction, LLC  
2319 Peach Tree Lane  
Dyer, IN 46311

/s/ Patrick N. Ryan

Patrick N. Ryan  
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